

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

IN THE MATTER OF THE	)	MISC. NO.: 2:21-mj-00018
APPLICATION OF THE UNITED	)	
STATES OF AMERICA FOR THE	)	
ISSUANCE OF A COMPLAINT AND	)	
ARREST WARRANT	)	
	)	

**MOTION TO SEAL**

The United States of America, by and through its undersigned Assistant United States Attorney, hereby moves this Court to seal the complaint, affidavit in support of the complaint, and arrest form. The Court has the inherent authority to seal and redact these documents. *See Baltimore Sun v. Goetz*, 886 F. 2d 60 (4th Cir. 1988). The purpose of the Government's request is to protect the information contained within the affidavit, to avoid the disclosure of the investigation at this time, and to prevent fugitives from continuing to flee prosecution.

Based on the facts in the affidavit, there is reason to believe that disclosure of the information would seriously jeopardize the investigation including by giving targets the opportunity to destroy or tamper with evidence, change patterns of behavior, flee from prosecution, intimidate cooperating and potential witnesses, and endanger the safety of law enforcement and other individuals. For these reasons, the Government submits that the interests in sealing the documents outweigh the common-law public right of access and that sealing is "essential to preserve higher values." *See Media Gen. Operations, Inc. v. Buchanan*, 417 F.3d 424, 429-31 (4th Cir. 2005). The Government further submits that, by sealing the requested documents while providing public access to the motion to seal and sealing order, the denial of access is narrowly

tailored to serve the Government's interests in sealing. *Id.* at 429.

Based on the foregoing, the Government requests that the complaint, affidavit in support of the complaint, and arrest form be filed under seal except that working copies should be made available to the United States Attorney's Office, FBI, and any other law enforcement agency designated by the United States Attorney's Office. The Government requests that these documents remain under seal until after the arrests and initial appearances of the targets of this investigation.

Respectfully submitted,

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UNITED STATES ATTORNEY

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